

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,

v.

Case No. 24-CR-00037-01-SRB

JOHNSON MANGOL,
Defendant.

**DEFENDANT MANGOL'S MOTION FOR LEAVE
TO FILE MOTION TO SUPPRESS**

Defendant Mangol, by and through undersigned counsel, respectfully moves the Court for leave to file the contemporaneously filed Motion to Suppress. Counsel further state as follows:

On February 26, 2024, Mr. Mangol requested appointment of counsel, and the Court appointed the Federal Public Defender. (Doc. 11). The matter was set on the Accelerated Jury Trial docket for October 21, 2024. (Doc. 35). In the scheduling order, the Court set the deadline for pretrial motions on June 6, 2024. (Doc. 35). On July 31, 2024, the Court granted Mr. Mangol's *Pro Se* Motion to Reconsider His Motion to Appoint Counsel and appointed undersigned counsel for Defendant. (Doc. 40, and 43).

The deadline for pretrial motions lapsed prior to the appointment of undersigned counsel in this matter. Counsel needed time to review the discovery, discuss the case with Mr. Mangol and research the issues in this matter.

Mr. Mangol now seeks leave to file a Motion to Suppress, which is filed contemporaneously herewith.

WHEREFORE, Mr. Mangol respectfully asks that the Court grant this Motion and grant leave to file the Motion to Suppress.

Respectfully submitted,

SANDAGE LAW LLC

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CERTIFICATE OF SERVICE

On December 23, 2024, I served this document by depositing an electronic copy of it in the Court's electronic filing system, which shall distribute notice to all attorneys of record.

/ s/ Laura O'Sullivan
Laura O'Sullivan